

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KAREN NASH, M.D.,)
Plaintiff,)
V.) No. 08 C 3648
COUNTY OF COOK)
Defendant.) Judge Zagel

NOTICE OF MOTION

TO: ELECTRONIC FILING AND U.S. MAIL

Linda C. Chatman
Marcus, Boxerman & Chatman
19 S. LaSalle St.
Suite 1500
Chicago, IL 60603

PLEASE TAKE NOTICE that on July 8, 2008, at 10:15 A.M., or as soon thereafter as the motion may be heard, I shall appear before the Honorable Judge James Zagel or any judge sitting in his stead in Room 2503 in the United States District Court for the Northern District of Illinois, Eastern Division at 219 South Dearborn, Chicago, Illinois and present Defendant's Motion for Enlargement of Time, a copy of which is attached hereto and served upon you. Courtesy copies delivered to the Court at the time of filing.

CERTIFICATE OF SERVICE

I, Jamieson B. Bowman, Assistant State's Attorney, certify that I served a copy of the foregoing by mailing a copy of the same to the above listed person at the above listed address(es) by depositing same in the U.S. Mail at 500 Richard J. Daley Center, Chicago, Illinois 60602, before 5:00 p.m. on July 1, 2008, and by filing a copy electronically with the Clerk of the Court.

RICHARD A. DEVINE
State's Attorney of Cook County

By: S/Jamieson B. Bowman
Jamieson B. Bowman
Assistant State's Attorney

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KAREN NASH, M.D.,)	
)	
Plaintiff,)	No. 08 CV 3648
)	
V.)	Judge Zagel
)	
COUNTY OF COOK,)	Magistrate Mason
)	
Defendant.)	

**DEFENDANT'S AGREED MOTION
FOR AN ENLARGEMENT OF TIME**

NOW COME the Defendants, County of Cook, Cook County Bureau of Health Services by their attorney, RICHARD A. DEVINE, State's Attorney of Cook County, through his assistant, JAMESON B. BOWMAN, Assistant State's Attorney, and hereby move this Honorable Court, pursuant to Federal Rule of Civil Procedure 6(b), for an enlargement of time in which to answer or otherwise plead to Plaintiff's Complaint and, in support of this motion, state as follows:

1. The Defendants were served with a summons and complaint in this case on approximately June 27, 2008.
2. To date, Defendants have begun to diligently preparing their answer, however, due to other litigation responsibilities Defendants require an extension of time in which to complete and file their answer.
3. This Motion is not made for dilatory reasons, rather it is a request for additional time made in good faith to enable the undersigned attorney to meet all obligations in a reasonable and orderly manner and will allow him to complete a well developed answer.
4. Defendants therefore request an extension, until August 1, 2008, within which to

file their Answer to the Complaint.

5. Defendants' counsel sought and obtained Plaintiff's counsel's agreement to the Defendants' extension request.
6. This is Defendants' first request for an enlargement of time.
7. The request for an extension is made in good faith and will not prejudice the parties in this matter.

WHEREFORE, Defendants respectfully request that this Honorable Court enlarge the time in which Defendants must answer or otherwise plead an additional 15 days, or until August 1, 2008.

Respectfully submitted,

RICHARD A. DEVINE
State's Attorney of Cook County

BY:


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